



DEPARTMENT OF THE AIR FORCE
AIR FORCE REAL PROPERTY AGENCY

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Mr. Keith Takata
U.S. Environmental Protection Agency Region IX
Mail Code (Air-6)
75 Hawthorne Street
San Francisco CA 94105

Mr. Donald L. Richey
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix AZ 85007

Dear Mr. Takata and Mr. Richey

The Air Force's position on the remediation of the groundwater at the Liquid Fuels Storage Area site ST-12 at the former Williams AFB AZ is as follows: the site presents no immediate risk to human health; the data show the contamination plume is not increasing in size, but in fact may be decreasing in size due to natural degradation processes and active recovery actions and is not mobile; and the use of thermal technology as a remedy to treat submerged petroleum hydrocarbons is unproven at a site with characteristics like those at ST-12.

We are very concerned that an aggressive thermal remedy could potentially open pathways that did not exist before and allow the plume to mobilize and migrate outside its current location. In addition, steam technology has been shown to actually disrupt natural degradation processes. For these very reasons we recently submitted a Request for Information (RFI) to determine if there was a less risky method that would meet the desired cleanup time, unfortunately, none were identified. Therefore, to resolve the dispute and move on with the cleanup and a final remedy for site ST-12, the Air Force intends to implement the pilot treatability study using a single Thermal Enhanced Extraction (TEE) cell.

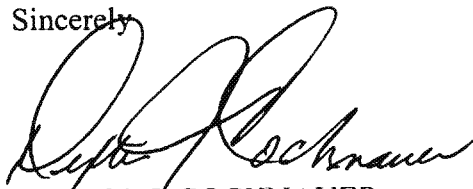
It is imperative that a true partnership exist between the regulatory agencies and the Air Force. This would mean an investment of resources by all parties since we are gathering data on an unproven technology that would benefit all parties now and in the future. This partnership would also help mitigate the risk of expansion of the plume and the need for any additional requirements due to any negative outcomes of the study. The details of the TEE pilot treatability study will be negotiated among all stakeholders. The key to the success of the pilot study will be well-defined performance objectives and data protocols that are acceptable to all stakeholders. These objectives and data protocols will define the success/failure of the pilot study. If it is

successful by those standards, the implementation of an operational two-cell TEE system will be coordinated and implemented based on the data derived from the study.

In an effort to expedite the pilot study, we request that all stakeholders identify their representatives along with their contact information by 10 February 2006. The representatives will determine the date, time and location of the meeting to begin negotiating the performance objectives and the data protocols. Once negotiations are complete and the agreement is memorialized in an appropriate decision document, we will begin the pilot study.

My point of contacts for the follow-on meetings will be Dr. William (Bill) Harris and Mr. Jay McCain; they can be reached at (916) 643-6420, ext 225 and ext 107, respectively.

Sincerely

A handwritten signature in black ink, appearing to read "Dexter Cochnauer", written over a horizontal line.

DEXTER J. COCHNAUER
Air Force Senior Representative
Western Execution Center - McClellan